

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Michael Anderson, Sheriff

No. of Copies rec'd 0
List ABCDE

JUL 28 3 27 PM '94

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Terry R. Marolt
Commissioner

Richard F. Vidmer
Chairman

RECEIVED Ed Simon
Commissioner

AUG 11 2 1994

Westmoreland County Pennsylvania



KURT T. SCALZOTT
Warden

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

AUG 28 3 27 PM '94

WILLIAM WHIRLOW
Deputy Warden of Security

ROBERT STEPANOVICH
Deputy Warden of Operations

EDWARD ZALEWSKI
Deputy Warden of Treatment

July 25, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE: CC DOCKET NO. 92-77
OPPOSITION TO BILLED PARTY PREFERENCE

Dear Chairman Hundt,

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.


No. of Copies rec'd
List ABCDE 0

WESTMORELAND COUNTY PRISON

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some correctional administrators do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmates calls and let correctional administrators enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of correctional administrators are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kurt T. Scalzott", with a large, stylized flourish at the end.

Kurt T. Scalzott, Warden
Westmoreland County Prison
3000 South Grande Boulevard
Greensburg, PA 15601

KTS/dm

cc: file



Harford County Sheriff's Office

P.O. BOX 150
BEL AIR, MARYLAND 21014-0150

DUCKET NO. 72-77

JUL 28



ROBERT E. COMES

July 20, 1994

Sheriff

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: BPP:CC Docket No. 72-77

AUG 11 2 1994
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Sir:

I am writing in protest of the proposed Billed Party Preference ("BPP"). As Warden of a County Detention Facility, I need the control that our inmate phone system provides.

Currently, we are able to accomodate the victims of crimes who request their phone number be blocked in order that they not be further victimized, parents whose daughters are constantly being called, and members of the general public who complain that inmates are harassing them. We will not be able to protect these citizens should your proposal be adopted. Likewise, we shall not be able to prevent the phone fraud that has been virtually non-existent since the installation of our current system.

Having control of the inmate calling system is an important tool in management of the facility inmate population. Abolishing that tool will greatly diminish the security which we now enjoy. Furthermore, I would be remiss if I failed to note that all inmate access to phones would be greatly diminished as the facility would be unable to provide the equipment which is now furnished by our contracted provider. We have no funding for equipment, nor for the numerous service calls/repairs. With ever increasing numbers in our population and budget cutbacks for the past several years, our budget is extremely limited. All these items are provided free by our contractor, whose rate was set by the Public Service Commission.

Your adoption of this regulation will not assist anyone; it can only be detrimental to inmates, Correctional facilities and the public they serve.

Sincerely yours,

Mr. Paul Hastmann, Warden
Harford County Detention Center
Bel Air, Maryland 21014-2322

No. of Copies rec'd 0
List ABCDE

CC: Sheriff Robert E. Comes

DOCKET FILE COPY ORIGINAL

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

JUL 28 3 27 PM '94

RECEIVED

AUG 11 2 1994

Re: CC Docket #92-77

Dear Chairman Hundt:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

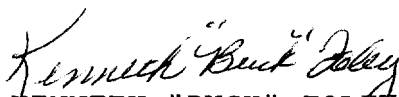
Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,


KENNETH "BUCK" FOLEY
BOONE COUNTY SHERIFF

No. of Copies rec'd 0
List ABCDE

August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

DOCKETED COPY ORIGINAL

RECEIVED

AUG 12 1994

Re: CC Docket No. 92-77 Opposition to Billed Party Preference **JUL 28 3 27 PM '94**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

St. Stanley Schrum
Name/Title

Seneca Co Correctional Facility
Name of Correctional Facility

44 W. Williams St. Waterloo, N.Y.
Address
13165

cc; The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness

No. of Copies rec'd 0
List ABCDE

Sheriff's Office

Floyd County Virginia



100 EAST MAIN STREET
ROOM 206
FLOYD, VIRGINIA 24091
(703) 745-9334

DOCKET FILE COPY ORIGINAL

JUL 28 3 27 PM '94

C. T. HIGGINS
SHERIFF

DONNIE L. PRATT
CHIEF DEPUTY

JERRY L. YOPP
CHIEF INVESTIGATOR

TROY W. WOOLLUMS
CHIEF CORRECTIONAL OFFICER

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 25, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: CC Docket No. 92-77 opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Part Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates.

No. of Copies rec'd
List ABCDE

0

We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decision--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

C. T. Higgins
C. T. Higgins
Sheriff, Floyd County

cc: The Honorable James Quella
The Honorable Rachelle B. Chong
The Honorable Andrew C. Barrett
The Honorable Susan Ness
APCC Inmate Phone Service Providers Task Force

LANCASTER COUNTY

LANCASTER COUNTY PRISON

COUNTY COMMISSIONERS
JAMES E. HUBER, Chairman
TERRY L. KAUFFMAN, Vice Chairman
BRAD S. FISCHER

625 EAST KING STREET, LANCASTER, PENNSYLVANIA 17602-3199

TELEPHONE: 717-299-7800

Jul 28 3 27 PM '94 CENT A. GUARINI
Warden

RECEIVED

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

July 26, 1994

RE: CC DOCKET NO. 92-77 OPPOSITION TO BILLED PARTY PREFERENCE

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

No. of Copies rec'd
List ABCDE

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,



Vincent A. Guarini/Warden
Lancaster County Prison
625 East King Street
Lancaster, PA 17602-3199

VAG/du

DOCKET FILE COPY ORIGINAL

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

JUL 28 3 27 PM '94

RECEIVED

AUG 12 1994

Re: CC Docket #92-77

Dear Chairman Hundt:

FEDERAL COMMUNICATIONS
OFFICE OF THE SECRETARY

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Alu Beth

Administrator

SE. K. R. C. C.

Ft. Scott, Ks.

No. of Copies rec'd 0
List ABCDE

J. W. TRAPP

Sheriff - Choctaw County
305 E. Jefferson - Hugo, OK 74743

DOCKET FILE COPY ORIGINAL

(405) 326-2369
Sawyer, OK 74756

JUL 28 3 28 PM '94

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 25, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Senator:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. For this reason, we are asking that inmates calls be exempt from the proposed BPP regulation.

Here are a few of my biggest concerns about Billed Party Preference:

Correctional facilities would not have the right to choose an inmate phone service provider

The current revenue-sharing arrangement I have with my provider would be eliminated, which would mean no more commissions for my facility

I would be stripped of my ability to control all inmates calls, which means I would be unable to track or block inmate calls

The cost of inmate calls would increase due to the expensive features required to control the fraud that is now controlled by your phone provider

Higher costs would mean fewer inmate phones, and correctional facilities would revert to the old ways of supervising each and every inmate call

No. of Copies rec'd 0
US: RCDE

The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. This costs everyone!

Your support and involvement in our effort is critical. Thank you for your consideration of my views.

Sincerely,

A handwritten signature in cursive script, appearing to read 'J. W. Trapp', written in dark ink.

J. W. Trapp
Sheriff

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Jul 28 3 28 PM '94

RECEIVED

AUG 11 2 1994

Re: CC Docket #92-77

Dear Chairman Hundt:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

No. of Copies rec'd
List ABCDE

0

August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

Name/Title

Name of Correctional Facility

Address

No. of Copies rec'd 0
List ABCDE

DIRECTOR OF CORONAL

JUL 28 3 27 PM '94 RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

SHERIFF AND CORONER



COUNTY OF SANTA CRUZ

ALFRED F. NOREN
SHERIFF-CORONER

JUL 28 3 27 PM '94
JUL 28 OCEAN ST., RM. 340
SANTA CRUZ, CALIFORNIA 95060

PHONE (408) ~~425-2935~~ 454-2964

IN REPLY PLEASE REFER

TO OUR FILE

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 22, 1994

Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Mr. Hundt:

As Sheriff-Coroner of Santa Cruz County and responsible for administering the local jail system, I am asking that the Federal Communications Commission exclude local jails from the proposed Billed Party Preference System.

Prior to the emergence of inmate phone service, we had a continuing problem with telephone fraud and inmates calling their victims and in some cases judges. Local jails cannot afford a sophisticated phone system with the ability to monitor phone calls and prevent such untoward activity without inmate phone service providers.

While I understand the Commission's desire to mitigate costs for this country's citizenry, the number of calls relating to jails is small by comparison to other phone systems the Commission is concerned with. Having victims and witnesses free from intimidation and harassment is certainly of paramount importance to the citizens.

While the cost to inmate and family may exceed that of normal calls, one must take into account the fact that inmates are in custody by reason of our justice system and their own actions. Some are pre-trial, many are serving sentences, and the very actions that brought them into custody invite a loss of some privileges.

Another issue is one of economics for correctional providers. We receive a portion of the costs charged for inmate phone calls and by state law these monies are restricted solely for the benefit of the inmates. These funds don't come directly from the taxpayer yet they provide Friends Outside, commissary benefits, and a variety of vocational and academic programs to hopefully preclude inmates' re-entry into the criminal justice system.

Additionally, if the present jail phone providers are eliminated by the Commission's action, that action will in effect reduce the communications ability of the individual inmates. I truly believe that inmate phone systems should be excluded from the Billed Party Preference program and ask that your Commission seriously consider such exclusion.

Sincerely,

No. of Copies rec'd 0
List ABCDE

Alfred F. Noren
ALFRED F. NOREN, Sheriff-Coroner

DUCKETT COPY ORIGINAL

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

JUL 28 3 27 PM '94
RECEIVED
AUG 11 2 1994

Re: CC Docket #92-77

Dear Chairman Hundt:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

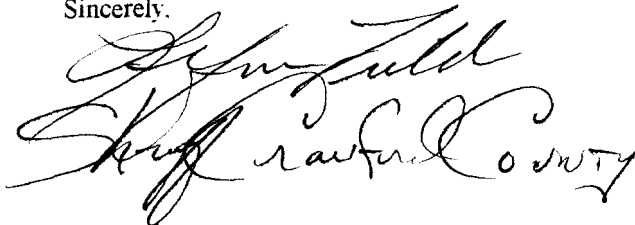
Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,



No. of Copies rec'd 0
LIST ABCDE

DOCKET FILE COPY ORIGINAL

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

JUL 28 3 26 PM '94

RECEIVED

AUG 11 2 1994

Re: CC Docket #92-77

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

No. of Copies rec'd 0
List ABCDE

Michelle B. Mitchell, Sheriff
Richmond City Jail



1701 Fairfield Way
Richmond, Virginia 23223
Jul 28 3 26 PM '94

DUPLICATE ORIGINAL

July 25, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

After analyzing the security and administrative needs of our facility, we have found it necessary to route inmate calls through a single carrier. This carrier is equipped to handle inmate calls and a firm with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. Billed Party Preference (BPP) will take away our right to coordinate inmate calls through a carrier we know can provide the levels of security required by a correctional facility. Instead, inmate calls would be routed through any number of carriers, none of whom would be obligated to us, and few trained or equipped to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed to handle inmate calls. This equipment helps enforce court restraining orders, prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints we are under, we cannot afford to provide inmate telephone equipment without the help of our inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. With BPP applied to inmate facilities, there will be no way for us to finance these phones, nor will there be any inmate phone service providers to assist us. Please try to imagine the dangerous conditions which would exist in our facility with 1,500 inmates who do not have access to telephones. **The explosiveness of this situation is beyond description.**

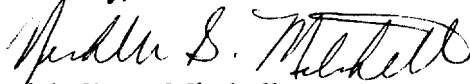
While some Sheriff's do not take responsibility for protecting inmate families from abusive rates, I can not be counted among them. Our current contract, at my insistence, specifically caps these rates for the sole purpose of protecting the families of inmates. BPP is not the solution for this lack of responsibility by a few. Rate ceilings do work and are the correct vehicle for fair and reasonable rates.

No. of Copies rec'd _____
List ABCDE _____

①

In short, BPP would take away our ability to employ important security and administrative measures which we find necessary at our facility and would drastically reduce inmate phone availability. I urge you to **REJECT** regulations which interfere with our administrative and security decisions. Decisions, for which I have a public responsibility to make.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michelle B. Mitchell".

Michelle B. Mitchell
Sheriff

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

DOCKET FILE COPY ORIGINAL

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

JUL 28 3 27 PM '94

RECEIVED

AUG 11 2 1994

Re: CC Docket #92-77

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Shiriff Ben Espy

Woodbury County

No. of Copies rec'd
List ABCDE

0

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

JUL 28 3 27 PM '94
RECEIVED

AUG 11 2 1994

Re: CC Docket #92-77

Dear Chairman Hundt:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Greg Howard
And. Co. Sherry

No. of Copies rec'd 0
List ABCDE



County of Tulare

OFFICE OF

Butch Coley, Sheriff-Coroner

County Civic Center, Visalia, California 93291
Telephone (209) 733-6218

DOCKET FILE COPY ORIGINAL



JUL 28 3 27 PM '94

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 22, 1994

Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, NW
Washington DC 20554

Re: Billed Party Preference; CC Docket #92-77

Dear Commissioner Hundt:

I am the Chief of Detentions for the Tulare County Sheriff's Department. My request is that the Federal Communications Commission exclude local jails from the proposed "Billed Party Preference" system for O+ Inter Lata pay phone traffic rules.

The BPP Plan does not take into account the day-to-day problems that arise in a local jail system. Most recently the mother of a female juvenile contacted me to complain of harassing phone calls her daughter was receiving from a local inmate. With the assistance of our local phone provider, I was able to immediately block further calls. We will no longer be able to provide this valuable service if the BPP Plan is adopted. Inmates would be free to threaten and harass whoever they please.

The BPP Plan will eliminate the current revenue-sharing programs that fund inmate education and other important programs. Without this revenue the programs will be cut or the local taxpayers will be required to shoulder an even bigger burden. The taxpayers I've talked to believe the inmate population should pay for as much of their incarceration expense as possible.

I am not insensitive to the rates that inmates and their families pay. I believe they should be reasonable as do most jail administrators. This is addressed during contract negotiations with the provider.

No. of Copies rec'd
List ABCDE

0

Hon. R. Hundt

-2-

July 22, 1994

Re: BPP

My staff and I are responsible for the management, control, and welfare of the inmate population in this county. We answer to the local voters for any decision we make. By not excluding local jails from the BPP Plan you are taking over a function that can be best dealt with by the local jail administration.

I am asking that you seriously consider excluding local jails from the BPP Plan.

Sincerely,


Chief J. Perryman

cc: Honorable James H. Quello
Honorable Andrew C. Barrett
Honorable Rachelle B. Chong
Honorable Susan Ness

hundt.lm



DEPARTMENT OF CORRECTIONS

OFFICE OF THE SECRETARY

115 East Dakota Avenue
Pierre, SD 57501-3216
Phone: (605) 773-3478
Fax: (605) 773-3194

JUL 28 3 28 PM '94

RECEIVED

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 26, 1994

THE HONORABLE REED E HUNT CHAIRMAN
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW
WASHINGTON D C 20554

RE: FCC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hunt:

The South Dakota Department of Corrections, representing the South Dakota State Penitentiary in Sioux Falls and the Springfield Correctional Facility in Springfield, strongly oppose the application of billed party preference to inmate facilities.

The administration of our inmate telephone systems through a single carrier under contract provides us with many advantages that would not be available with multiple carriers selected by the inmates.

- 1) The carrier provides all the equipment and maintains it. The department would be unable to provide this equipment without their assistance. Lack of access by the inmates would increase tension in the institution.
- 2) This equipment prevents fraud, abusive calls and other criminal activity. It provides the ability to limit phone calls and lockout abilities in emergencies. It provides recording options for investigations and institutional security.
- 3) The revenues provided by this program are utilized to benefit inmate programs. These would not be replaced with state funding, further increasing inmate tension.

We are sensitive to the rates paid by the families and friends of the inmates. We try to negotiate rates that are not abusive to the inmate families. An alternative to billed party preference may be establishing a ceiling on allowable rates that can be charged.

No. of Copies rec'd 0
List ABCDE